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Attorneys for Defendant Discovery
Communications, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ESTATE OF JERRY A. SPOLAR, a
deceased individual; and TONNY JILL
WILLIAMSON, an individual,

Plaintiffs,

v.

DISCOVERY COMMUNICATIONS,
LLC, a Delaware limited liability
company,

Defendants.

Case No. 2:23-cv-07633-JFW-MRW

**STIPULATION TO EXTEND TIME
TO RESPOND TO FIRST
AMENDED COMPLAINT**

Date Action Filed: September 13, 2023

FAC Served: June 25, 2024

Current Response Date: July 9, 2024

New Response Date: August 8, 2024

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Los Angeles, California 90067

STIPULATION TO EXTEND
TIME TO RESPOND TO
FIRST AMENDED COMPLAINT

1 Plaintiffs Estate of Jerry A. Spolar and Tonny Jill Williamson
 2 (collectively, “Plaintiffs”) and Defendant Discovery Communications, LLC
 3 (“Discovery”) by and through their respective counsel, hereby stipulate as
 4 follows:

5 RECITALS

6 A. Plaintiffs filed their Complaint in the above-captioned action on
 7 September 13, 2023.

8 B. Plaintiffs served Discovery with the Summons and Complaint on May
 9 6, 2024.

10 C. The Parties agreed to an extension of Discovery’s time to respond to
 11 the initial Complaint from May 28, 2024 through and including June 27, 2024.

12 D. The Parties met and conferred on June 17, 2024 to discuss Discovery’s
 13 intention to bring a motion to dismiss under Fed. R. Civ. Pro. 12(b)(6).

14 E. On June 25, 2024, Plaintiffs filed a First Amended Complaint.

15 F. Pursuant to Fed. R. Civ. Pro. 15(a)(3), Discovery is required to
 16 respond by July 9, 2024.

17 G. Discovery has requested and Plaintiffs have agreed to an extension of
 18 Discovery’s time to respond to the First Amended Complaint by 30 days, from July
 19 9, 2024 through and including August 8, 2024.

20 H. This extension of time is warranted because Discovery needs
 21 additional time to evaluate the allegations in the First Amended Complaint in light
 22 of its anticipated motion to dismiss and to allow the Parties to meet and confer
 23 further in regards to such motion. In addition, Discovery’s lead trial counsel is
 24 presently traveling out of the country until July 3 (*see* Declaration of Aaron J.
 25 Moss, Dkt. No. 37-1).

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STIPULATION

NOW THEREFORE, by and through their respective counsel of record,
Plaintiffs and Discovery hereby stipulate and agree that Discovery's response to the
First Amended Complaint shall be due on August 8, 2024.

IT IS SO STIPULATED.

DATED: July 2, 2024

GREENBERG GLUSKER FIELDS
CLAMAN & MACHTINGER LLP

By: /s/ Joshua M. Geller

AARON J. MOSS (SBN 190625)
JOSHUA M. GELLER (SBN 295412)
Attorneys for Defendant Discovery
Communications, LLC

DATED: July 2, 2024

EDMONDSON IP LAW

By: /s/ J. Curtis Edmondson

J. CURTIS EDMONDSON (SBN
236105)
Attorneys for Estate of Jerry A. Spolar
and Tonny Jill Williamson

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ATTESTATION

I, Joshua M. Geller, am the ECF user whose ID and password are being used to file this document. In compliance with C.D. Cal. Civ. L.R. LR 5-4.3.4(a)(2)(i), I hereby attest that concurrence in the filing of the document has been obtained from each of the other signatories which shall serve in lieu of their signatures on the document.

DATED: July 2, 2024

GREENBERG GLUSKER FIELDS
CLAMAN & MACHTINGER LLP

By: /s/ Joshua M. Geller

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